

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

COALITION TO MARCH ON THE RNC,

Plaintiff,

v.

Civil Action No:

**CITY OF MILWAUKEE, CAVALIER
JOHNSON in his official capacity as Mayor of
the City of Milwaukee, and JERREL
KRUSCHKE in his official capacity as
Commissioner of Public Works for the City of
Milwaukee,**

Defendants.

DECLARATION OF R. TIMOTHY MUTH

I, R. Timothy Muth, declare:

1. I am over the age of eighteen, and I am competent to make this declaration. I provide this declaration based upon my personal knowledge. If called as a witness, I would and could competently testify to the facts stated herein, all of which are within my personal knowledge.

2. I am a Staff Attorney at the American Civil Liberties Union of Wisconsin Foundation.

3. I submit this declaration in support of Plaintiff's Complaint for Injunctive Relief, Motion for Injunctive Relief, and accompanying materials. As part of preparing this declaration

I have also reviewed pertinent records to refresh my recollection and to ensure that the information and details included here are true, accurate, and correct.

4. When the City of Milwaukee began to consider a Special Events Ordinance for the Republican National Convention, the ACLU of Wisconsin submitted written testimony to the Milwaukee Public Works Committee on March 18, 2024. A true and correct copy of that written testimony is attached as Exhibit 14.

5. A true and correct copy of a March 18, 2024 e-mail to the members of the Milwaukee Common Council concerning the proposed Special Event Ordinance is attached as Exhibit 8.

6. The Common Council adopted the Special Event Ordinance, a true and correct copy of which is attached as Exhibit 2.

7. The City of Milwaukee released a “preliminary security footprint” for the 2024 Republican National Convention, a true and correct copy of the map is attached as Exhibit 3.

8. On March 28, 2024 I received a telephone message from Asst. City Attorney Kathryn Block regarding the parade permit application of the Coalition to March on the RNC. A true and correct copy of a transcript of that message generated by my voicemail software is attached as Exhibit 9.

9. Attached as Exhibit 10 is a true and correct copy of the blank online RNC parade permit application form used by the City, accessed on April 17, 2024.

10. A true and correct copy of an e-mail from myself to Asst City Attorney Kathryn Block dated April 17, 2024 is attached as Exhibit 11.

11. Attorney Block acknowledged receipt of my April 17, 2024 e-mail.

12. On April 26, 2024, a letter was sent from attorneys for the Republican National Committee to the Director of the United States Secret Service, with a copy to the Mayor of the City of Milwaukee. I requested and received a copy of the letter from the City, a true and correct copy of which is attached as Exhibit 4.

13. A true and correct copy of a letter I wrote and e-mailed to Milwaukee Mayor Cavalier Johnson and Commissioner of Public Works Jerrel Kruschke on May 30, 2024 is attached as Exhibit 12.

14. As of today, neither the Coalition nor I have received any official notification from the City of a determination on the Coalition's parade permit application, nor of the Official Parade Route described in the Special Event Ordinance.

I declare under penalty of perjury that the foregoing is true and correct.

Date: June 5, 2024

/s/ R. Timothy Muth

R. Timothy Muth